

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

MARC VEASEY, *et al.*,

Plaintiffs,

v.

Civil Action No. 2:13-cv-193 (NGR)

RICK PERRY, *et al.*,

Defendants.

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC
COUNTY JUDGES AND COUNTY
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

Civil Action No. 2:13-cv-263 (NGR)

STATE OF TEXAS, *et al.*,

Defendants.

TEXAS STATE CONFERENCE OF NAACP
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

Civil Action No. 2:13-cv-348 (NGR)

STATE OF TEXAS, *et al.*,

Defendants

**OPPOSITION TO THIRD PARTY DEBBIE RIDDLE'S ORIGINAL MOTION TO
QUASH THE SUBPOENA FOR DEPOSITION**

Plaintiffs Texas NAACP and MALC have subpoenaed Representative Debbie Riddle for her deposition. Representative Riddle played a unique role in the legislative proceedings leading up to the enactment of SB 14. She was deposed in the Section 5 litigation, during which time she invoked legislative privilege to numerous questions posed by the Defendant and Defendant-Intervenors in that case. The Department of Justice has fully briefed the reasons why this deposition should go forward in the United States' Opposition to Texas Legislators' Motions to Quash Deposition Subpoenas (ECF 309), which briefing Plaintiffs incorporate herein by reference.

Without burdening this Court with additional argument, for the reasons set forth in the submission of the United States, Plaintiffs respectfully request that this Court deny Representative Riddle's motion to quash.

Dated: June 5, 2014

Respectfully submitted,

s/ Ezra Rosenberg
Ezra D. Rosenberg
Michelle H. Yeary
Dechert LLP
902 Carnegie Center, Suite 500
Princeton, New Jersey 08540-6531
ezra.rosenberg@dechert.com

Steven B. Weisburd
Amy L. Rudd
Lindsey Cohan
Dechert LLP
500 W. 6th Street, Suite 2010
Austin, Texas 78701
lindsey.cohan@dechert.com

Wendy Weiser
Myrna Pérez
Vishal Agraharkar
Jennifer Clark
The Brennan Center for Justice at NYU Law School
161 Avenue of the Americas, Floor 12
New York, New York 10013-1205
wendy.weiser@nyu.edu
myrna.perez@nyu.edu
vishal.agraharkar@nyu.edu
jenniferl.clark@nyu.edu

Robert A. Kengle
Mark A. Posner
Sonia Kaur Gill
Erandi Zamora
Lawyers' Committee for Civil Rights Under Law
1401 New York Avenue, N.W., Suite 400
Washington, D.C. 20005
mposner@lawyerscommittee.org

Clay Bonilla
The Law Offices of William Bonilla, P.C.
2727 Morgan Ave.
Corpus Christi, Texas 78405
claybonilla@hotmail.com

Daniel G. Covich
The Covich Law Firm LLC
Frost Bank Plaza, Suite 2100
Corpus Christi, TX 78405
Daniel@covichlawfirm.com

Gary Bledsoe
PotterBledsoe, L.L.P.
316 West 12th Street, Suite 307
Austin, Texas 78701
garybledsoe@sbcglobal.net

Robert Notzon
The Law Office of Robert Notzon
1502 West Avenue
Austin, Texas 78701
Robert@NotzonLaw.com

Jose Garza
Law Office of Jose Garza
7414 Robin Rest Drive
San Antonio, Texas 98209
garzapalm@aol.com

Kim Keenan
Marshall Taylor
Victor Goode
NAACP
4805 Mt. Hope Drive
Baltimore, Maryland 21215
Telephone: (410) 580-5120
kkeenan@naacpnet.org
mtaylor@naacpnet.org
vgoode@naacpnet.org

*Counsel for Plaintiffs Texas State Conference of
NAACP Branches, Mexican American Legislative
Caucus of the Texas House of Representatives*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document is being served by electronic mail on June 5, 2014, to all counsel of record.

/s Michelle Hart Yeary
Michelle Hart Yeary